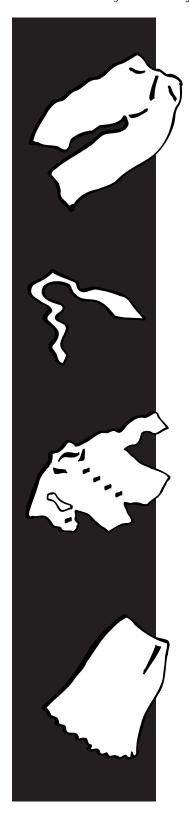


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Summary of Discussion

Session III

Jo Patton of the Center for Neighborhood Technologies (CNT) opened the discussion by thanking the speakers. She said that the conference had been informative and provided an opportunity to hear from apparel and textile manufacturers, communicate new developments, and decide where to go from here. She said the conference had made her optimistic about the future. She then opened the floor to comments and questions about what the next steps might be.

Bill Seitz of the Neighborhood Cleaners Association-International (NCAI) stated he had waited 45 years for the kind of dialogue that took place at the conference, and he couldn't be more pleased with the results. He stated that, in the final analysis, all the participants really serve the same master—the consumer. As a result, everything and anything that gets done jointly will benefit everybody.

Mr. Seitz stated that many people in the dry cleaning industry have looked upon the industry as a kind of necessary evil, but it is an extremely important part of the process. Talking about the textile industry in general terms is really a mistake, because the textile industry, just like the dry cleaning industry, has broad ranges of expertise and problems.

Mr. Seitz stated that NCAI's 1996 report on 1995 garment analysis (a copy of which is available) addresses these issues. It not only talks about the types of problems but the types of companies who are creating the problems. Sears, JC Penney, K Mart, and the Gap do not appear in the garment analysis reports, because they never have problems. Some of the companies in the report, however, are among the "who's who" of fashion: Ann Klein, Burberry, Calvin Klein, DKM, Ellen Tracy, Georgio Armani, Jones New York, Liz Claiborne, Nordica, Tommy Hilfiger, and so forth. These companies use labels that say "dry clean only." The NCAI report makes the point that consumers blame the manufacturer or the retailer for damages, but only after they place blame on the dry cleaner. Dry cleaners end up paying for many garments that they shouldn't because they want to keep the customers' goodwill. Mr. Seitz said that it's not just a question of paying for the garment. The lost customer in many cases is more expensive than the garment, and that's a decision the dry cleaner makes that he would estimate is in the area of hundreds of thousands of dollars a year. He said that dry cleaners need a better and closer working relationship with the textile industry.

Mr. Seitz expressed concern about remarks made about the Federal Trade Commission's (FTC's) future responsibility. He stated that regulations don't mean much unless there is enforcement. He reiterated that there have only been six or seven cases brought against manufacturers in 25 odd years of enforcement, yet thousands and thousands of garments fail every year. He said he would like to see the enforcement gap close up a little bit so dry cleaners are not faced with the responsibility for failed garments. There are



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many garments that are improperly labeled, many are not labeled at all, and many are imported and have misleading labels. He stated that the notion that dry cleaners encourage low labeling in order to get more business is not true. Low labeling happens because the manufacturer often perceives that the dry cleaner will clean the garment better than the consumer. Given the changing world for the textile industry, dry cleaners, and the consumer, working together will be the solution to solving the problem.

Connie Vecellio of the Federal Trade Commission (FTC) stated that the FTC does enforce the care labeling rule and estimated that in the last 4 years they brought six cases. Prior to that FTC only brought one case because FTC spent quite a few years promulgating and amending the rule, a process that was quite lengthy and took up a lot of resources. FTC is now committed to enforcing the rule and is doing so. Ms. Vecellio requested the information referenced by Mr. Seitz.

Jack Weinberg of Greenpeace began his comments by thanking those responsible for making the meeting possible and expressing his belief that the meeting had been very productive. He explained that he had learned a lot about the labeling issue and was pleased that many people were discussing environmental concerns. He reminded people that as a representative of Greenpeace, he was most concerned with the environmental impact, but respected other people's interests.

Mr. Weinberg referred to the discussions concerning consumer education and suggested that if people could identify areas where the various interests can agree on consumer education, Greenpeace can be helpful in getting the message out. He believes Greenpeace can be very helpful in consumer education on the environmental issues where environmentalists can in good conscious have the same opinion.

Mr. Weinberg expressed some concern about care labeling. He wants to ensure that wet clean labeling actually achieves its intended objective. His concern is whether a wet cleaning label will be part of a transformation of moving more garments from dry cleaning to wet cleaning or whether a wet cleaning label will become a mechanism for fabricating a market and reinforcing that some garments need to be dry cleaned and some garments need to be wet cleaned. Mr. Weinberg expressed his belief that some substantial portion of clothing marked dry clean only can be very successfully wet cleaned.

Mr. Weinberg said that waiting to put wet clean labels on clothing until enough professional cleaners have the capability is a "chicken and the egg" problem. Cleaners will not do it until manufacturers require it. If only one label is required and it is either a dry clean label or a wet clean label, this will lead to additional problems while the professional garment care industry works to improve their techniques. He recommended a label that essentially says "professionally clean this garment." He suggested that this will allow wet cleaning technologies to be phased in as they become available.

Ken Adamson from Langley Parisian Limited in Ontario, Canada, provided some additional information on the Canadian wet cleaning project. He



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decided to use care labeling as a guide, but leave it to the operators to decide which cleaning method to use. He believes that the worst thing we could do is to end up with a wet cleaning ghetto and a dry cleaning ghetto. He thinks that the fabric care specialist has to balance the two cleaning processes to optimize their operation based on environmental concerns and the garments that he or she is handling.

Jo Ann Pullen of the American Society for Testing and Materials (ASTM) expressed her pleasure with the openness of the meeting. She explained that ASTM standard is a very easy standard to revise and improve, as long as technical information is available on which to base the revisions. She expressed some concern with Mr. Weinberg's proposal for a single label, unless that label has very specific information.

Ms. Pullen encouraged everyone to work with Europe and Europe to work with the United States through the American Association of Textile Chemists and Colorists (AATCC) to gather the information needed for specific conditions. Certain categories of textiles with trims may need a specific condition. She explained that there are different detergents for different fibers or variations in how to do things. Ms. Pullen encouraged the group to develop a label that has technical information that meets the needs of industry and wet cleaners.

Manfred Wentz of FLARE/AATCC thanked Ms. Pullen and explained that, as discussed the previous day, they have already established a close working relationship with the European developments as well as a collaborate effort to do international round robin testing to assess individual parameters necessary for identification. He mentioned that they have already received a proposal from the European Standard Organization on wet cleaning that will be scrutinized and adapted to the needs of the U.S. market. He repeated from the previous day's discussion that Dr. Charles Riggs already had one of his students visiting Hohenstein to get familiar with European wet cleaning testing protocol. The challenge, he suggested, is getting the appropriate information necessary to the apparel and textile industry so that they feel comfortable in identifying the proper care methods.

Ms. Pullen mentioned that in the ASTM system you can put both dry clean and wet clean on the label and report both processes.

Kay Villa of the American Textile Manufacturers Institute (ATMI) asked Mr. Weinberg to clarify Greenpeace's goals.

Mr. Weinberg explained that Greenpeace originally became involved in the issue because they are involved in a worldwide campaign to faze out production and use of certain substances, including perchloroethlyene (perc). That is the primary goal, although Greenpeace has other goals. He stated that one of the intermediate goals is promoting wet cleaning. Another Greenpeace goal is to help cleaners make the transition to alternative methods. Greenpeace, according to Mr. Weinberg, is working with the entire fabric care industry, including manufacturers, to change care practices and whatever else has to be changed to move to a time when perchloroethlyene



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and presumably many other organic solvents are no longer a part of clothes cleaning.

Mr. Seitz explained that the Neighborhood Cleaners Association (NCA) is involved in wet cleaning for a number of reasons, including environmental reasons. He explained that they are not convinced that perc is going to be eliminated, but are working towards reduction, an important part of the process. He suggested that the fact perc consumption had decreased a third over the last 10 years speaks well for the industry.

Mr. Seitz explained that the reason for the move toward wet cleaning is not just environmental, but also to satisfy the customer. He repeated a dry cleaning slogan, "dressing casual doesn't mean you have to look like a casualty." He reminded the audience that the dry cleaning industry has been wet cleaning for over 60 years. The big breakthrough is not equipment as much as it is chemistry and technology. There are better detergents, better solvents, better fabric softeners, better fabric finishers, and changing textiles (such as the move towards polyester, which lends itself better to wet cleaning). He suggested that it is up to the NCA to educate their members who in turn will educate the consumer. The NCA, according to Mr. Seitz, is not advocating the use of perc, but at the moment there is nothing better to replace it with. Unless and until that time comes, cleaners will continue to use it with all of the environmental constraints, controls, and requirements.

Margit Machacek from JC Penny's quality assurance center near Dallas noted that at JCPenney they check garments for quality, performance, and the accuracy of the label. The experience problems with low labeling. She suggested that suppliers be encouraged to provide accurate labels. It is not sufficient to educate the consumer without also educating the suppliers. She asked Ms. Vecellio what the current status of care symbols at FTC is. Many suppliers have been saying they can use care symbols without accompanying words as long as they attach information. Is this the case?

Ms. Vecellio replied that currently the FTC requires labels to have words.

Ms. Machacek asked for clarification and Ms. Vecellio explained that it is permissible to have symbols in addition to the words, but words are required. That is the law. Ms. Vecellio explained that the FTC has indicated it will eventually allow the use of symbols without words, which may be confusing Ms. Machacek's suppliers. Ms. Vecellio expects a final FTC decision to be published in the Federal Register this year, but based on the public comments, there probably will be some delay before garments can be sold in stores with only symbols because time is needed for a public education campaign.

Ms. Machacek asked if it was acceptable to the FTC to have a label containing symbols if it was accompanied by something explaining the meaning of the symbols.

Ms. Vecellio replied that it was not acceptable at this time. The permanent care label must have words, but FTC proposed that for some first period, maybe the first year, maybe the first eighteen months that symbols are



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allowed without words, there should be some additional material like a hang tag explaining these symbols.

Ms. Vecellio also elaborated on Ms. Machacek's earlier comments about low labeling. Under the current law, a garment can be labeled either "dry clean *only*" or indicate that it can be washed. She explained that a garment cannot be labeled "dry clean *only*" if it can be washed because that is an untrue statement and is a violation of the rule. The FTC asked for information on that type of labeling in a Federal Register (FR) notice and some people indicated that the low labeling practice exists. If so, according to Ms. Vecellio, it is a violation of the rule.

Ms. Machacek asked about a scenario in which a label said line dry only. Wouldn't that be a violation of the rule because it could also be machine dryable?

Ms. Vecellio replied no, if it says line dry to avoid shrinkage because the garment might be damaged if it were tumble dried.

Jessica Goodheart of the University of California - Los Angeles (UCLA) Wet Cleaning Demonstration Project, expressed her agreement with earlier comments that it is important to involve the garment and textile industry in the discussion and is happy they participated. She explained that is one reason that they invited the Gap to serve on their advisory committee, along with the President of the Fashion Industry Alliance in Los Angeles, the largest apparel manufacturing center in the country. Ms. Goodheart invited everyone to visit the Los Angeles wet cleaning demonstration site. They have washed more than 9,000 garments in a 100 percent wet clean shop and will be hosting tours through January 1997.

Ms. Goodheart asked if people from the textile and apparel industry feel they understand what wet cleaning is because it is a new technology. There is talk about multi-process wet cleaning, machine wet cleaning, and other new equipment. She also asked if there was any information that would facilitate the industry's adoption of the items being discussed at the seminar.

Ms. Villa responded to Ms. Goodheart's inquiry by explaining that although she has a degree in textile engineering and has a strong understanding of what wet cleaning is, she does not feel that information on wet cleaning has been exchanged adequately between the industries. She suggested that this kind of seminar facilitates full communication and allows others to learn about the textile industry, the way it is configured, the way it works, and how products are transferred down the chain to the consumers.

Dr. Wentz reiterated Ms. Villa's comments about the need to foster communication. He suggested, however, that the dry cleaning industry, a \$60 billion a year industry, is familiar with wet cleaning and understands the variables that affect textiles. He referenced a book that lists over 500 standards that describe the property changes or potential changes of textiles under variable conditions. Mr. Wentz explained that as a Design for the Environment stakeholder committee member and having worked as a member of the professional wet cleaning group that Mr. Weinberg alluded to, his



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objective is to educate all parties. Dr. Wentz also explained that there is a difference between hearing and acting upon information. His objective when putting together the conference was to develop an objective basis for exchanging information between affected industries.

Dr. Wentz also mentioned the activities of the AATCC Committee. At their May 1996 meeting, they had over 30 people participating and he mentioned that it was Ms. Villa who introduced a motion that AATCC participate in the European Wet Cleaning Committee Round Robin Trial and that they participate in the International Activities to the Evolution and the Assessment of Wet Cleaning.

Dr. Charles Riggs of Texas Woman's University expressed his concern that a standard definition for wet cleaning does not currently exist. He suggested that the AATCC and ASTM develop a standardized definition of wet cleaning. Dr. Riggs warned that if people move ahead with new labels before developing a standard definition, everyone will be going in different directions.

Mr. Weinberg continued the discussion of a standard definition because he believes that the point has been reached where it has to occur. He also suggested that there is a lot of discussion about whether wet cleaning is a new or old cleaning method. While the technique may be old, there are new soaps, new machines, new processes, and a new revitalization of something that certainly looks new. Mr. Weinberg suggested that it is something that is significantly different from home laundering and that old wet cleaning methods might not have been. He stated his belief that what needs to occur is a move towards an operational definition of wet cleaning.

John Michener from Millikon pointed out that IFI often gets items into their laboratory that are label "dry clean," but the lab analysis reveals that the garment should have been laundered, it wasn't dry cleanable. All to often people are misusing care labels. Mr. Michener stressed the importance of having the apparel and the textile industries work with ASTM and AATCC as the test procedures are developed so that we can label apparel properly. On mislabeling, Mr. Michener said he did some research for IFI to find out if fabrics and garments originating in the United States had mislabeling problems or if it was mainly an import problem. It turns out that while the United States is about four times better than China in terms of proper labeling, there are some countries that are four times better than the United States. Mr. Michener didn't think the FTC was the place to go to for enforcement of proper labeling. Consumer Reports, Greenpeace, and other organizations probably get more media attention than the FTC. For Ms. Vecellio to do anything, she has to go into court and that's expensive for all concerned including those who have to pay a higher price for clothing as a consequence of the legal cost. He has seen what JC Penney does in the way of testing and they do a pretty good job of enforcement of proper labeling for the products that they sell. They are doing an enforcement job and that's something everyone should be doing. Information about companies that are mislabeling should be publicized.



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On the subject of wet cleaning, Mr. Michener expressed his concern about whether wet cleaning would get clothes as clean as dry cleaning. In the interest of the environment, we have eliminated phosphates, and that has made it more difficult to make effective detergents. Also, we have been dropping the temperature on our water heaters and that makes it more difficult to get our clothes clean. Mr. Michener said that for him, his environment starts with his underwear, and he wants his intimate environment to be clean. The data presented has focused on shrinkage and dye loss and not so much on cleanliness.

Doug Kelly of Boewe-Permac thanked the organizers, speakers, and moderators. He offered Boewe-Permac's assistance, and said he was sure many other manufacturers would be happy to assist with the process of producing proper care labels.

Jenni Cho from the Korean Youth and Community Center stressed the importance of reaching out to the Korean American population because they really are a significant part of the industry. She pointed out that the UCLA Wet Cleaning Demonstration Project is in partnership with Korean Americans. Ms. Cho said her organization is putting together Korean tours and also working on tours in Spanish, as many dry cleaning pressers are of Latino origin. They are trying to also establish a Korean demonstration site in the Los Angeles area. They are producing Korean brochures and flyers and information and would ultimately like to produce a bilingual video on wet cleaning in Korean and English. She noted that Los Angeles has the biggest population of Korean Americans and demonstration sites in other parts of the country might not have the same level of resources. She offered to provide copies of information in Korean that participants could pass on to train dry cleaners. She expressed interest in networking with other organizations in order to reach out to Korean Americans.

Ms. Patton closed the discussion by commenting that they had heard a lot of offers for exchange of information and assistance and asking Jan Connery to begin the final session focusing on the next steps to take.